



University of Hawaii at Manoa

Environmental Center
A Unit of Water Resources Research Center
Crawford 317 • 2550 Campus Road • Honolulu, Hawaii 96822
Telephone: (808) 956-7361

June 18, 1992
RP:0148

Mr. Ed Chen
Clean Water Branch
Environmental Management Division
Department of Health
Five Waterfront Plaza, Suite 250
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Dear Mr. Chen:

Section 401 WQC Application
Artificial Reefs Maintenance and Expansion Activity
Existing Sites Off the Islands of:
Oahu: Maunalua Bay, Waianae, Kualoa, Ewa
Maui: Keawakapa

This ongoing project provides the public with additional fishing and diving opportunities through the creation of artificial reefs which increase the available habitat and marine life in relatively flat, barren and unproductive areas of ocean bottom. All materials used to construct the reefs are inspected by representatives of the U.S. Coast Guard and the Department of Land and Natural Resources and must be found to be contaminate-free and not a potential hazard to divers.

The Environmental Center has reviewed the above referenced document with the assistance of Richard Brock and Chris Woolaway, Sea Grant; and Alex Buttarro, Environmental Center.

Our reviewers expressed concern that the way the permit is written may allow the Division of Aquatic Resources to undertake in the proposed activities without adequate quality control. Materials that have not been properly sorted or graded may be used, leading to a tendency to incorporate artificial reefs as de facto municipal waste disposal sites.

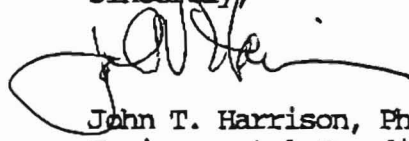
During the past legislative session, Senator Crozier considered a resolution allowing the dumping of construction rubble generated by the development of the rapid transit system for artificial reef construction, and our reviewers noted that only some of the construction material may be appropriate.

Mr. Ed Chen
June 18, 1992
Page 2

We suggest that there should be some mechanism for permit agencies to review disposal events on a case by case basis. The review should include not only the materials proposed for use, but how they are to be deployed, etc.

Our reviews supports the concept of artificial reefs provided that a strong element of overall environmental sensitivity is incorporated. Other than the above expressed concerns, our reviewers found this application acceptable.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Harrison", written over a horizontal line.

John T. Harrison, Ph.D.
Environmental Coordinator

cc: OEQC
Richard Brock
Roger Fujioka
Chris Woolaway
Alex Buttaro